

4. For example, the purported “washing account” referenced in paragraph 15 of the superseding indictment is an account held in the name of EFT Business Services, LLC, (“EFT”) an entity whose principal place of business is in the Southern District of Florida.

5. The individuals who kept the books and records for that account and were part of the transactions in question, were all either employees of EFT or Transact First, Inc., (“TF”), another entity whose principal place of business is in the Southern District of Florida. These individuals are all located in the Southern District of Florida.

6. If these individuals were required to travel to New York for extended periods of time, it would create unnecessary business disruption for both EFT and TF.

7. The money used for the yacht purchase referenced in paragraph 16 of the superseding indictment was held in a bank account in the Southern District of Florida and, again, the individuals who kept the books and records for that account, as well as the individuals who were part of the transactions in question were all located in the Southern District of Florida.


8. Thus, the individuals who could testify about the transactions referenced in paragraphs 15 and 16 of the superseding indictment and the relevant documentary evidence related to those transactions are all located in the Southern District of Florida.

9. Also, as I discussed in my previous Declaration that was filed in support of Michael Shvartsman’s Omnibus Pre-Trial Motions on December 22, 2023 (Dkt. 57), the government’s money laundering investigation was initially launched in the Southern District of Florida, not in the Southern District of New York, and the primary government witness appears to be a Miami DHS agent who later continued that investigation with the Southern District of New York. *See* Dkt 57 at ¶¶ 5-16.

10. The transactions that form the bases for the money laundering counts were revealed to the government by documents produced by Mr. Shvartsman and his affiliated companies' counsel. The documents and presentations made to them demonstrate that every one of these transactions had a business purpose that was meticulously documented.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: February 29, 2024



Tai H. Park